



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Region 1

**5 Post Office Square, Suite 100
Boston, MA 02109-3912**

URGENT LEGAL MATTER -- PROMPT REPLY NECESSARY
CERTIFIED MAIL: RETURN RECEIPT REQUESTED

October 13, 2016

Park Corporation
c/o Daniel K. Park, President
210 Airside Dr.
Pittsburgh, PA 15108

Re: Request for Information Pursuant to Section 104 of CERCLA for the
Keddy Mill Superfund Site, Windham, ME

Dear Mr. Park:

This letter seeks your cooperation in providing information and documents regarding Park Corporation ("Park") relating to the environmental conditions at, and cleanup of, the Keddy Mill Superfund Site located at 7 Depot Street, Windham, Maine ("Site").

The United States Environmental Protection Agency ("EPA") is investigating the release or threatened release of hazardous substances, pollutants, and contaminants at the Site. This investigation includes an inquiry into the identification, nature, source, and quantity of materials transported to or generated, treated, stored, or disposed of at the Site. EPA is also seeking information concerning those persons responsible for the cleanup of the Site and their ability to undertake or finance that cleanup.

Pursuant to the authority of Section 104(e) of the Comprehensive Environmental Response, Compensation and Liability Act ("CERCLA"), 42 U.S.C. § 9604(e), you are hereby requested to respond to the Information Request set forth in the Enclosure to this letter.

While EPA seeks your voluntary cooperation in this investigation, compliance with the Information Request is required by law. Failure to provide a complete truthful response to this Information Request within thirty (30) days of your receipt of this letter, or to adequately justify such failure to respond, may subject you to an enforcement action by EPA pursuant to Section 104(e) of CERCLA. This provision permits EPA to seek the imposition of penalties of up to fifty three thousand, nine hundred and seven dollars (\$53,907) for each day of non-compliance. Please note that responses which are incomplete, ambiguous, or evasive will be treated as complete non-compliance with this Information Request. Also be further advised that provision of false, fictitious, or fraudulent statements or representations may subject you to criminal penalties under 18 U.S.C. § 1001.

This Information Request is not subject to the approval requirements of the Paperwork Reduction Act of 1980, 44 U.S.C. § 3501 et seq.

Your response to this Information Request should be mailed to:

Donna Murray, Enforcement Coordinator
U.S. Environmental Protection Agency, Region 1
Office of Site Remediation and Restoration
5 Post Office Square, Suite 100
Mail Code: OSRR07-2
Boston, MA 02109-3912

If you have general questions concerning the Site or this Information Request, please contact Leslie McVickar, Remedial Project Manager, U.S. Environmental Protection Agency, 5 Post Office Square, Suite 100 (OSRR07-4), Boston, MA 02109-3912 at (617) 918-1374. If you have any legal questions, or if your attorney wishes to communicate with EPA on your behalf, please contact Susan Scott, Senior Enforcement Counsel, U.S. Environmental Protection Agency, 5 Post Office Square, Suite 100 (OES04-2), Boston, MA 02109-3912, at (617) 918-1778.

We appreciate and look forward to your prompt response to this information request.

Sincerely,



Chau Vu, Acting Chief
Maine, Vermont & Connecticut Superfund Section
Office of Site Remediation and Restoration

Enclosures: Information Request, including the following: information request questions; a declaration for signature; information request instructions; EPA's contractor list; information request definitions; a Site description; and a deed from the Cumberland County, ME Registry of Deeds.

cc: Susan Scott, EPA Senior Enforcement Counsel
Leslie McVickar, EPA Remedial Project Manager
Donna Murray, EPA Enforcement Coordinator
Rebecca Howett, Maine DEP
Patti Ludwig, EPA CERCLIS Data Administrator
OSRR Record Center

**INFORMATION REQUEST FOR
KEDDY MILL SUPERFUND SITE**

* **Period Being Investigated: 1969 to 1975** *
* * *

In addition to the questions which follow, this enclosure includes a declaration, a site description, detailed instructions for responding to this request, and definitions of words such as “Respondent,” “identify,” “waste,” and “asset” used in the questions. These materials appear at the end of the questions; please refer to them in answering all questions. Of particular importance:

- Answer each question with respect to the period being investigated noted above unless the question indicates otherwise.
- Answer all questions completely in accordance with the definitions and instructions.
- Complete the enclosed declaration.
- For each question, identify all persons and documents relied upon in the preparation of the answer.
- All information provided for which you are making a claim of business confidentiality or which contains personal privacy information should be contained on separate sheets and clearly marked as confidential or private.

This request imposes a continuing obligation upon you to submit responsive information discovered after your original response is submitted to EPA.

INFORMATION REQUEST QUESTIONS

1. General Information About Respondent:

NOTE: All questions in this section refer to the present time unless otherwise indicated.

- a. Provide the full legal name and mailing address of the Respondent.
- b. For each person answering these questions on behalf of Respondent provide:
 - i. full name;
 - ii. title;
 - iii. business address; and
 - iv. business telephone number and email address.
- c. If Respondent wishes to designate an individual for all future correspondence concerning this Site, including any legal notices, please so indicate here by providing that individual's name, address, telephone number, and email address.

2. Respondent's Legal and Financial Status:

NOTE: All questions in this section refer to the period being investigated.

- a. If the Respondent has ever done business under any other name:
 - i. list each such name; and
 - ii. list the dates during which such name was used by Respondent.
- b. If Respondent is a corporation, provide:
 - i. the date of incorporation;
 - ii. state of incorporation;
 - iii. agent for service of process;
 - iv. the names of current officers; and
 - v. the names of current directors.
- c. If Respondent is, or was a subsidiary of, otherwise owned or controlled by, or affiliated with another corporation, describe each such relationship, including but not limited to:
 - i. a general statement of the nature of the relationship;
 - ii. the dates such relationship existed;
 - iii. the percentage of ownership of Respondent that is or was held by such other

- entity; and
 - iv. for each such affiliated entity provide the names and complete addresses of its parent, subsidiary, and otherwise affiliated entities.
- d. If Respondent no longer exists as a legal entity because of dissolution provide:
- i. a brief description of the nature and reason for dissolution;
 - ii. the date of dissolution;
 - iii. documents memorializing or indicating the dissolution of the entity; and
 - iv. a statement of how and to whom the entity's assets were distributed.
- e. If Respondent no longer exists as the same legal entity it was during the period being investigated because of transactions involving asset purchases or mergers, provide:
- i. the titles and dates of the documents that embody the terms of such transactions (*i.e.*, purchase agreements, merger and dissolution agreements);
 - ii. the identities of the seller, buyer, and any other parties to such transactions; and
 - iii. a brief statement describing the nature of the asset purchases or mergers.
- f. If Respondent has filed for bankruptcy, provide:
- i. the U.S. Bankruptcy Court in which the petition was filed;
 - ii. the docket numbers of such petition;
 - iii. the date the bankruptcy petition was filed;
 - iv. whether the petition is under Chapter 7 (liquidation), Chapter 11 (reorganization), or other provision; and
 - v. a brief description of the current status of the petition.

3. Ownership at the Site:

NOTE: All questions in this section refer to the period being investigated unless otherwise stated.

- a. Provide a detailed narrative description of Park's purpose for acquiring the Site from ITT Grinnell in 1973 and the purpose for selling of the Site in 1974.
- b. Did Park Corporation own or operate at the Site for any other period other than between 1973 and 1974? If so, please answer all questions regarding this additional time period.
- c. Did Park Corporation acquire the Site after the disposal or placement of the hazardous substances on, in, or at the Site? Describe all of the facts on which you base the answer to the preceding question.

- d. Describe all investigations of the Site Park Corporation undertook prior to acquiring the Site and all of the facts on which you base the answer to the preceding question.
- e. Provide copies of all deeds relating to past ownership, acquisition, and encumbrance of the Site.

4. Operations at the Site:

NOTE: All questions in this section refer to the time period from 1969 to 1975.

- a. Describe all activities undertaken at the Site by Park Corporation during its ownership of the Site or after its period of ownership, including but not limited to:
 - i. a brief narrative of the day-to-day operation of the Site;
 - ii. a description of the Respondent's activities at the Site by date;
 - iii. a description of the generation, storage, placement, disposal or treatment of wastes at the Site by date;
 - iv. the identification of lessees, contractors, tenants, or others who carried out operations at the Site;
 - v. a description of the activities each lessee, contractor, tenant, or others took at the Site by date;
 - vi. a description of the collection of monies or other compensation for use of the Site by others;
 - vii. a description of the construction and/or demolition of any surface or subsurface structures at the Site (including but not limited to the dates such activities took place); and
 - viii. a description of any other significant operations or activities at the Site.
- b. Identify each person, including but not limited to Respondent's employees, responsible for carrying out any activities at the Site during the period under investigation.
- c. If the nature or size of Park Corporation's operations at the Site changed over time, describe those changes and the dates they occurred.
- d. List all of the products, equipment and/or machinery, which Park Corporation removed, sold/liquidated, recycled, recovered, treated, or otherwise processed at or from the Site.
- e. Describe the cleaning and maintenance of the equipment and machinery involved in these operations or before the products/equipment/machinery was removed or sold/liquidated/recycled, including but not limited to:

- i. the types of materials used to clean/maintain the product/equipment/machinery; and
 - ii. the monthly or annual quantity of each such material used.
- f. Describe the methods used to clean up spills of liquid or solid materials, including polychlorinated biphenyls ("PCBs"), during operation, including but not limited to:
 - i. the types of materials spilled in operations;
 - ii. the materials used to clean up those spills;
 - iii. the methods used to clean up those spills; and
 - iv. where the materials used to clean up those spills were disposed of.
- g. Describe all leaks, spills, or releases at or from the Site of materials that were or may have been hazardous, toxic, flammable, reactive, or corrosive, or may have contained hazardous substances and/or PCBs, including, but not limited to:
 - i. the date of each such occurrence;
 - ii. the specific location on the Site of each such occurrence; and
 - iii. the materials that were involved in each such occurrence in terms of the nature, composition, color, smell, and physical state (solid or liquid) of such material.
- h. Describe and provide the dates of all activities undertaken by Park Corporation and others to:
 - i. address all leaks, spills, or releases of materials, including PCBs, at or from the Site; and
 - ii. to prevent a threatened leak, spill, or release at or from the Site.
- i. Describe all fires, explosions, or similar occurrences at the Site, including but not limited to:
 - i. the dates of such occurrences;
 - ii. the specific locations on the Site of such occurrences;
 - iii. the nature of such occurrences; and
 - iv. the measures taken to respond to them.
- j. Provide all information you have regarding the disposal, treatment, storage, or recycling of wastes, including PCBs, at the Site during the period being investigated.
- k. Provide all information you have that during the period being investigated:
 - i. the wastes disposed, treated, stored, placed or recycled at the Site included hazardous substances; and
 - ii. hazardous substances were released at the Site.

1. Identify and provide copies of all surveys, studies, or collections of data which Park Corporation conducted or authorized concerning the Site.
5. Information About Others:
- a. If you have information concerning the operation or ownership of the Site or the source, content or quantity of materials placed/disposed at the Site which is not included in the information you have already provided, provide all such information.
 - b. If not already included in your response, if you have reason to believe that there may be persons, including persons currently or formerly employed by Respondent, who are able to provide a more detailed or complete response to any of these questions or who may be able to provide additional responsive documents, identify such persons and the additional information or documents that they may have.
 - c. If not already provided, identify all persons, including Respondent's current and former employees, who have knowledge or information about the generation, use, purchase, treatment, storage, disposal, placement or other handling of materials at, or transportation of materials to, the Site.

The following form of declaration must accompany all information submitted by Respondent in response to the Information Request:

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of

_____ and that the foregoing is complete, true, and correct.
Respondent

Executed on _____, 20__

Signature

Type Name

Title [if any]

INFORMATION REQUEST INSTRUCTIONS

1. Answer Every Question Completely. You are required to provide a separate answer to each and every question and subpart of a question set forth in this Information Request. Incomplete, evasive, or ambiguous answers shall constitute failure to respond to this Information Request and may subject you to the penalties set out in the cover letter.
2. Number Each Answer. Number each answer with the number of the question to which it corresponds.
3. Provide Information about the Period Being Investigated. You are required to answer each question with respect to the period being investigated, unless the question specifically states otherwise. If the response fails to address the period being investigated, EPA will consider this a failure to comply with the request and may take action against you for this noncompliance.
4. Provide the Best Information Available. You must provide responses to the best of Respondent's ability, even if the information sought was never put down in writing or if the written documents are no longer available. You should seek out responsive information from current and former employees/agents. Submission of cursory responses when other responsive information is available to the Respondent will be considered non-compliance with this Information Request.
5. Identify Sources of Answer. For each question, identify (see Definitions) all the persons and documents that you relied on in producing your answer.
6. Submit Documents with Labels Keyed to Question. For each document produced in response to this Information Request, indicate on the document (or in some other reasonable manner) the number of the question to which it responds.
7. Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to this Request become known or available to you after you respond to this Request, EPA hereby requests pursuant to CERCLA Section 104(e) that you supplement your response to EPA. Failure to supplement your response within 30 days of discovering such responsive information may subject you to \$53,907 per day penalties. If at any time after the submission of this response, you discover or believe that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response. If any part of the response to this Information Request is found to be false, the signatory to the response and the company may be subject to criminal prosecution.
8. Complete the Enclosed Declaration. You are required to complete the enclosed declaration which certifies that the information you are providing in response to this Information Request is true, accurate, and complete.
9. Confidential Information. The information requested herein must be provided even though

you may contend that it includes confidential information or trade secrets. You may assert a confidentiality claim covering part or all of the information requested, pursuant to Sections 104(e)(7)(E) and (F) of CERCLA, 42 U.S.C. §§ 9604(e)(7)(E) and (F), and 40 C.F.R. § 2.203(b). All information claimed to be confidential should be contained on separate sheet(s) and should be clearly identified as “confidential business information,” “trade secret” or “proprietary” or “company confidential.” These separate marked sheets should be submitted to EPA by hard copy or compact disc, and not by email. Personal financial information, including individual tax returns, may also be claimed as confidential. In addition, please note that you bear the burden of substantiating your confidentiality claim. Your claim of confidentiality should be supported by the submission of information supporting such a claim; the type of information to be submitted is set out in 40 C.F.R. Part 2. Information covered by a claim of confidentiality will be disclosed by EPA only to the extent, and only by means of the procedures, provided in 40 C.F.R. §§ 2.201-2.311. **If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you.** You should read the above cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

10. Disclosure to EPA Contractor. Information which you submit in response to this Information Request may be disclosed by EPA to authorized representatives of the United States, even if you assert that all or part of it is confidential business information. Please be advised that EPA intends to disclose all responses to this Information Request to one or more of its private contractors listed in the attached EPA Contractor List for the purpose of organizing and/or analyzing the information contained in the responses to this Information Request. If you are submitting information which you assert is entitled to treatment as confidential business information, you may comment on this intended disclosure within fourteen (14) days of receiving this Information Request.

11. Personal Privacy Information. Personnel and medical files, and similar files the disclosure of which to the general public may constitute an invasion of privacy should be segregated from your responses, included on separate sheet(s), and marked as "Personal Privacy Information." You should note however, that unless prohibited by law, EPA may disclose this information to the general public without further notice to you. (Please see Instruction 9 for information concerning treatment of individual tax returns.)

12. Objections to Questions. While the Respondent may indicate that it objects to certain questions in this Information Request, it must provide responsive information notwithstanding those objections. To object without providing responsive information may subject Respondent to the penalties set out in the cover letter.

13. Claims of Privilege. If you claim that any document responsive to this Information Request is a communication for which you assert that a privilege exists for the entire document, identify (see Definitions) the document and provide the basis for asserting the privilege. For any document for which you assert that a privilege exists for a portion of it, provide the portion of the document for which you are not asserting a privilege, identify the portion of the document for

which you are asserting the privilege, and provide the basis for such an assertion. Please note that regardless of the assertion of any privilege, any facts contained in the document which are responsive to the Information Request must be disclosed in your response.

EPA CONTRACTOR LIST

Updated February, 2015

CONTRACTOR

CONTRACT NUMBER

ASRC Primus Solutions, Inc.
Subcontractor: Booz Allen Hamilton
Effective: August 22, 2013

Contract # EP-W-11-024

Eisenstein Malanchuk LLP
Effective: March 1, 2013

Contract # EP-W-013-006

H&S/Nobis
Effective: September 23, 2011
Subcontractor: TechLaw, Inc.

START 8(a) Contract # EP-S1-11-03

INFORMATION REQUEST DEFINITIONS

All terms not defined herein shall have their ordinary meaning, unless such terms are defined in CERCLA, 42 U.S.C. Section 9601 et seq., RCRA, 42 U.S.C. Section 6901 et seq., or Volume 40 of the Code of Federal Regulations (CFR), in which case such statutory or regulatory definitions shall apply.

The following definitions shall apply to the following words as they appear in this Enclosure:

1. The term "you" or "Respondent" shall mean each entity identified as the addressee of this Request, the addressee's officers, managers, employees, contractors, trustees, successors, assigns, and agents, and any predecessor or successor corporations or companies.
2. The terms "document" and "documents" shall mean any method of recording, storing, or transmitting information, including, but not limited to, electronic information. "Document" shall include, but not be limited to:
 - (a) writings of any kind, including electronic documents, formal or informal, whether or not wholly or partially in handwriting, including (by way of illustration and not by way of limitation) any of the following:
 1. invoice, receipt, endorsement, check, bank draft, cancelled check, deposit slip, withdrawal slip, order;
 2. letter, correspondence, fax, telegram, telex, E-mail;
 3. minutes, memorandum of meetings and telephone and other conversations, telephone messages;
 4. agreement, contract, and the like;
 5. log book, diary, calendar, desk pad, journal;
 6. bulletin, circular, form, pamphlet, statement;
 7. report, notice, analysis, notebook;
 8. graph or chart; or
 9. copy of any document.
 - (b) microfilm or other film record, photograph, or sound recording on any type of device;
 - (c) any tape, disc, or other type of memory generally associated with computers and data processing, together with:
 1. the programming instructions and other written material necessary to use such punch card, disc, or disc pack, tape or other type of memory; and
 2. printouts of such punch card, disc, or disc pack, tape or other type of memory; and

- (d) attachments to or enclosures with any document as well as any document referred to in any other document.

3. The term “identify” or “provide the identity of” means, with respect to a natural person, to set forth: (a) the person's full name, (b) present or last known business and home addresses and telephone numbers; (c) present or last known employer (include full name and address) with job title, position or business; and (d) the person's social security number.

4. The term “identify” or “provide the identity of” means, with respect to a corporation, partnership, business trust, government office or division, or other entity (including a sole proprietorship), to set forth: (a) its full name; (b) complete street address; (c) legal form (e.g. corporation, partnership, etc.); (d) the state under whose laws the entity was organized; and (e) a brief description of its business.

5. The term “identify” or “provide the identity of” means, with respect to a document, to provide: (a) its customary business description (e.g., letter, invoice); (b) its date; (c) its number if any (e.g., invoice or purchase order number); (d) the identity of the author, addressor, addressee and/or recipient; (e) and a summary of the substance or the subject matter. Alternatively, Respondent may provide a copy of the document.

6. The term “material” or “materials” shall mean any and all objects, goods, substances, or matter of any kind, including but not limited to wastes.

7. The terms “the period being investigated” and “the relevant time period” shall mean the period being investigated as specified on the first page of the Information Request Questions.

8. The terms “the Site” or “the facility” shall mean and include the property on or about the 7 acres of land in Windham Maine, currently identified by EPA as the Keddy Mill Superfund Site, which is more fully described in the enclosed Site Description.

9. The term “waste” or “wastes” shall mean and include trash, garbage, refuse, by-products, solid waste, hazardous waste, hazardous substances, and pollutants or contaminants, whether solid, liquid, or sludge, including but not limited to containers for temporary or permanent holding of such wastes.

10. The term “asset” shall mean and include but not be limited to the following: cash, commodities, personal property, collectibles, real estate, equipment, vehicles, furniture, inventory, supplies, customer lists, accounts receivable, interest in insurance policies, interests in partnerships, corporations, and unincorporated companies, whether foreign or domestic, securities, patents, stocks, bonds, and other tangible as well as intangible property.

11. The term “real estate” shall mean and include, but not be limited to the following: land, buildings, a house, dwelling place, condominium, cooperative apartment, office or commercial building, including those located outside the United States.

SITE DESCRIPTION

The Keddy Mill Superfund Site ("Site") is located at 7 Depot Street in the Town of Windham, Cumberland County, Maine. The approximate 7-acre Site is located in the Little Falls portion of Windham, Maine. The property is bounded to the north by Depot Street; to the northeast by a partially-developed commercial parcel; to the east by a former Maine Central Railroad right-of-way; to the south and southwest by undeveloped property and the Presumpscot River; to the west by the Presumpscot River, a parking lot property, and a hydroelectric dam and power generating station; and to the northwest by an occupied apartment complex. The Site is further identified on the Town of Windham, Maine tax assessors map as Map 38, lot 7 and the deed recorded at the Cumberland County Registry of Deeds in Book 29050, Pages 322-326.

Many industrial activities were conducted on the Site between 1756 and 1997, including a sawmill, grist and wool carding mill, wood pulp and boxboard manufacturing, steel manufacturing and fabrication of heavy equipment buckets, manufacturing of fire suppression piping and materials, a small machine shop and equipment storage. The site has been vacant since 1997.

Contaminants of concern at the Site include polychlorinated biphenyls ("PCBs") and metals. Contamination from PCBs is widespread throughout the site and inside the abandoned mill building. The Site includes at least two sources of contamination. These include a pile of deposited slag material on the north side of the mill building, and an area of contaminated soil extending from north of the vacant building to the southwest side of the building adjacent to the Presumpscot River.

Samples taken from the Site indicate the presence of VOCs including 2-butanone, acetone, and methyl acetate; SVOCs including numerous polynuclear aromatic hydrocarbons ("PAH's"); PCBs including Aroclor-1242, Aroclor-1248; and numerous metals (arsenic, cadmium, chromium, cobalt, copper, iron, manganese, nickel and zinc) in surface soil. VOCs, PAHs, PCBs and metal were in slag samples.

Various studies and cleanup activities have occurred at the Site. The Maine Department of Environmental Protection ("DEP") coordinated two removal actions at the site by previous owners. The first involved the excavation of 10.88 tons of petroleum impacted soil in 1997. The second, during May and July 2010, was performed in accordance with the Toxic Substances Control Act ("TSCA") Self Implementing Clean-up Plan ("SICP") submitted in 2006. Only a portion of the SICP was performed, including removal of PCB-contaminated fuel oils in remaining piping and PCB-contaminated sludge, dirt, debris and oily materials from within the building. In addition, the current owner constructed a fence around the site at the request of the Maine DEP to deter trespassers.

The Keddy Mill Site was proposed to the National Priorities List of Sites ("NPL") in May, 2013 and placed on the NPL on May 12, 2014.

END OF THE INFORMATION REQUEST

THANK YOU FOR YOUR ASSISTANCE IN THIS MATTER

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3450

20412

KNOW ALL MEN BY THESE PRESENTS,

THAT ITT GRINNELL CORPORATION, formerly known as GRINNELL CORPORATION, a corporation organized and existing under the laws of the State of Delaware and located at Providence in the County of Providence and State of Rhode Island, in consideration of One Dollar (\$1.00) and other valuable considerations paid by PARK CORPORATION, a corporation organized and existing under the laws of the State of Nevada and located at 3100 MacCorkle Avenue SW., So. Charleston in the County of Kanawha and State of West Virginia, the receipt whereof it does hereby acknowledge, does hereby GIVE, GRANT, BARGAIN, SELL AND CONVEY, unto the said PARK CORPORATION, its successors and assigns forever, a certain lot or parcel of land with the buildings thereon, situated in the Town of Windham, County of Cumberland and State of Maine bounded and described as follows:

Beginning at a point (marked by a monument set) on the easterly side line of Main Street (Route #202), which point is located One Hundred Seventy-five (175) feet southerly along said easterly side line of Main Street from the southwesterly corner of land now or formerly owned by Robert P. Miele, et al; thence South $77^{\circ} 33'$ East Three Hundred Fifty-five and Eighty-three Hundredths (355.83) feet on a course which intersects the face of the westerly foundation of the main factory building situated on the land herein conveyed at a right angle thereto at a point (marked by a drill hole set); thence South $12^{\circ} 27'$ West along the said face of the westerly foundation Fifty-eight and Seventy-four Hundredths (58.74) feet to a corner of said foundation; thence South $77^{\circ} 50'$ East by the face of the southerly foundation of said building a distance of Three Hundred (300) feet to a point (marked by an iron set); thence South $1^{\circ} 59-1/2'$ West Three Hundred (300) feet to a point (marked by a monument set) which is located One Hundred Fifty (150) feet westerly of land now or formerly of the Maine Central Railroad, said distance being measured at a right angle to the westerly boundary of said Railroad land; thence South $79^{\circ} 49-1/2'$ East One Hundred Fifty (150) feet to a point on said westerly Railroad boundary (marked by an iron set); thence North $10^{\circ} 10-1/2'$ East by said Railroad land a distance of Four Hundred Seventy-one and Thirty-six Hundredths (471.36) feet to a point; thence northerly along said Railroad boundary along an arc having a radius of One Thousand Eight Hundred Eighty-one and Eighty-six Hundredths (1881.86) feet One Hundred and Ninety-seven Hundredths (100.97) feet to a point (marked by an iron set) on the southeasterly corner of

land now or formerly of the Hart heirs; thence South 75° 49' West by said land of the Hart heirs One Hundred Forty-seven and Sixty-five Hundredths (147.65) feet to the southerly corner of said land of the Hart heirs (marked by an iron set); thence North 41° 27' West Seventy-two (72) feet to a southwesterly corner of the land of the Hart heirs (marked by an iron set); thence North 15° 32' West One Hundred Forty-one (141) feet to the northwesterly corner of the land of the Hart heirs on the southerly side of Depot Street (marked by a monument set); thence South 73° 29' West Thirty-five and Eighty-three Hundredths (35.83) feet along the southerly side of Depot Street to a point (marked by an iron set); thence North 89° 7' West Two Hundred Eighty-one and Eighty-one Hundredths (281.81) feet to the northeasterly corner of land now or formerly owned by Dorothy Chaplin (marked by a monument set); thence South 15° 46-1/2' West Fifty-nine and Ninety-seven Hundredths (59.97) feet to the southeasterly corner of said Chaplin land (marked by a monument set); thence North 83° 2' West Fifty-five and Sixty-five Hundredths (55.65) feet to a southerly corner of said Chaplin land (marked by an iron set); thence North 80° 55' West Eighteen and Ninety Hundredths (18.90) feet to the southwesterly corner of said Chaplin land (marked by an iron set); thence North 15° 46-1/2' East Fifty-seven and Seventy-five Hundredths (57.75) feet to the northwesterly corner of said Chaplin land on the southerly side line of Depot Street (marked by a monument set); thence North 80° 55' West Eighty-nine and Fifty Hundredths (89.50) feet to the northeasterly corner of land now or formerly of Robert P. Miele (marked by an iron set); thence South 15° 46-1/2' West Fifty-seven and Seventy-five Hundredths (57.75) feet to the southeasterly corner of said Miele land (marked by an iron set); thence North 80° 55' West Ninety-nine and Fifty Hundredths (99.50) feet to the southwesterly corner of said land of Robert P. Miele on the easterly side line of Main Street; thence South 13° 56-1/2' West One Hundred Seventy-five (175) feet to the point of beginning; together with all the Grantor's right, title, and interest in and to the land extending to the Central Line of all streets or roads adjoining said premises.

The above described premises are those conveyed to the Grantor herein under its former name "Grinnell Corporation" by Keddy Manufacturing Co. by deed dated October 17, 1969 and recorded in Cumberland County Registry of Deeds in Book 3110, Page 603, and are shown on "PLAN OF LAND IN SOUTH WINDHAM, MAINE" by Owen Haskell, Inc., of South Portland, Maine, dated July 14, 1969, which plan is attached to said deed to the Grantor herein and recorded at pages 607-614 of said Book 3110.

Also conveyed herewith is right to have the office balcony which is now next to the face of the southerly wall of the main factory building project over the

land formerly owned by Atlantic Mills, Inc. and now or formerly owned by Lawrence J. Keddy.

Also conveyed herewith and appurtenant to the above described premises is a right-of-way for vehicles and pedestrians Thirty (30) feet in width over the land formerly owned by Atlantic Mills, Inc. and now or formerly owned by Lawrence J. Keddy extending easterly from the easterly side of Main Street (Route #202) at the point of beginning of the above described premises to a doorway located in the westerly foundation of the main factory building.

This conveyance is made subject to Maine Central Railroad side track agreements.

This conveyance is also made subject to a right-of-way conveyed by Cumberland Securities Corporation to Central Maine Power Company by deed dated October 6, 1944, recorded in the Cumberland County Registry of Deeds, Book 1759, Page 348 and also subject to electrical distribution line rights-of-way as they may pertain to the above described premises reserved in the Deed of Cumberland Securities Corporation to Windham Fibres, Inc. dated July 25, 1945 recorded in said Registry of Deeds Book 1787, Page 353.

The above described premises are the premises conveyed by Atlantic Mills, Inc. to Keddy Manufacturing Co. by deed dated June 6, 1961, recorded in said Registry of Deeds Book 2611, Page 192.

This conveyance is made subject to real estate taxes for 1973 which the Grantee herein assumes and agrees to pay.

TO HAVE AND TO HOLD the aforegranted and bargained premises with all the privileges and appurtenances thereof to the said PARK CORPORATION, its successors and assigns, to its and their use and behoof forever.

AND the said Grantor Corporation does hereby COVENANT with the said Grantee, its successors and assigns, that it is lawfully seized in fee of the premises, that they are free of all encumbrances, that it has good right to sell and convey the same to the said Grantee to hold as aforesaid; and that it and its successors, shall and will WARRANT AND DEFEND the same to the said Grantee, its successors and assigns forever, against the lawful claims and demands of all persons, except as aforesaid.

IN WITNESS WHEREOF, the said ITT GRINNELL CORPORATION

has caused this instrument to be sealed with its corporate seal and signed in its corporate name by David D. McKenney its Vice President thereunto duly authorized, this 21st day of August in the year one thousand nine hundred and seventy-three.

Signed, Sealed and Delivered
in presence of

Edward Funch

ITT GRINNETT CORPORATION

By
its



STATE OF RHODE ISLAND

COUNTY OF PROVIDENCE, ss.

August, 21, 1973

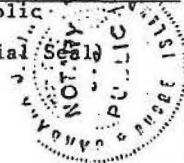
Then personally appeared the above named David D. McKenney of said Grantor Corporation as aforesaid, and acknowledged the foregoing instrument to be his free act and deed in his said capacity, and the free act and deed of said corporation.

Before me,

Barbara J. Birtwell
Notary Public

(Notarial Seal)

BARBARA J. BIRTWELL
NOTARY PUBLIC
MY COMMISSION EXPIRES JUNE 22, 1974



AUG 28 1973

REGISTRY OF DEEDS, CUMBERLAND COUNTY, MAINE

Received at 11 B 43 AM, and recorded in

BOOK 3450 PAGE 31

H. Eric Hughes

Register

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

Park Corporation
c/o Daniel K. Park
President
210 Airside Dr.
Pittsburgh, PA 15108

2. Article Number

(Transfer from service label)

7003 1010 0003 3496 6423

PS Form 3811, February 2004

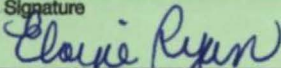
Domestic Return Receipt

102595-02-M-1540

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X


☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

10-18-16

D. Is delivery address different from item 1? ☒ Yes☐ No

If YES, enter delivery address below:

☐ No

3. Service Type

☒ Certified Mail☐ Express Mail☐ Registered☐ Return Receipt for Merchandise☐ Insured Mail☐ C.O.D.

4. Restricted Delivery? (Extra Fee)

☐ Yes

U.S. Postal Service™

CERTIFIED MAIL™ RECEIPT

(Domestic Mail Only; No Insurance Coverage Provided)

For delivery information visit our website at www.usps.com

OFFICIAL USE

Postage

\$

Certified Fee

Return Receipt Fee
(Endorsement Required)Restricted Delivery Fee
(Endorsement Required)

Total Postage & Fees

\$

Postmark

Here

104E Ltr
Oct. 13
2016

Sent To

Street, Apt. No.,
or PO Box No.

City, State, ZIP+4

Park Corporation c/o Daniel K.
210 Airside Dr. Park
Pittsburgh, PA 15108

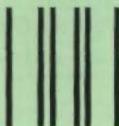
7003 1010 0003 3496 6423

UNITED STATES POSTAL SERVICE

PA-150

18 OCT '16

PM 2 L



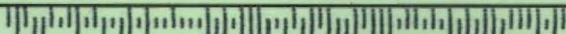
First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

- Sender: Please print your name, address, and ZIP+4 in this box •

Donna Murray
U.S. Environmental Protection Agency
5 Post Office Square, Suite 100
Mail Code OSAR07-2
Boston, MA 02109-3912

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394625



Certified Mail Provides:

- A mailing receipt
- A unique identifier for your mailpiece
- A record of delivery kept by the Postal Service for two years

(Reverse) PS Form 3800, June 2002

Important Reminders:

- Certified Mail may ONLY be combined with First-Class Mail® or Priority Mail®.
- Certified Mail is not available for any class of international mail.
- NO INSURANCE COVERAGE IS PROVIDED with Certified Mail. For valuables, please consider Insured or Registered Mail.
- For an additional fee, a *Return Receipt* may be requested to provide proof of delivery. To obtain Return Receipt service, please complete and attach a Return Receipt (PS Form 3811) to the article and add applicable postage to cover the fee. Endorse mailpiece "Return Receipt Requested". To receive a fee waiver for a duplicate return receipt, a USPS® postmark on your Certified Mail receipt is required.
- For an additional fee, delivery may be restricted to the addressee or addressee's authorized agent. Advise the clerk or mark the mailpiece with the endorsement "Restricted Delivery".
- If a postmark on the Certified Mail receipt is desired, please present the article at the post office for postmarking. If a postmark on the Certified Mail receipt is not needed, detach and affix label with postage and mail.

IMPORTANT: Save this receipt and present it when making an inquiry.
Internet access to delivery information is not available on mail addressed to APOs and FPOs.